

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**UNOPPOSED MOTION TO FILE UNDER SEAL: PLAINTIFFS' RESPONSE TO  
DEFENDANT'S MOTION FOR A PROTECTIVE ORDER PROHIBITING PLAINTIFFS  
FROM DEPOSING SERGEY BRIN, SUNDAR PICHAI, AND NEAL MOHAN**

Plaintiff States ("States") respectfully move the Court for leave to file under seal: PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION FOR A PROTECTIVE ORDER PROHIBITING PLAINTIFFS FROM DEPOSING SERGEY BRIN, SUNDAR PICHAI, AND NEAL MOHAN, and the accompanying appendices and exhibits, which include Google-produced documents and information about Google's productions, as well as deposition testimony of Google employees. Defendant Google LLC ("Google") does not oppose the States' sealing request.

The States, with Google's consent, request to file under seal their Response brief and exhibits because, according to Google: The exhibits, and the citations to them in the States' Response Brief, include personal information of Google's current and former employees, as well as non-public sensitive commercial information of Google.

Consistent with Local Rule CV-5, the States will work with Google to determine and then file any public and/or redacted versions—with as limited redactions as possible—of these documents within seven (7) days.

For the reasons stated above, the States respectfully request that this Court allow the States to file the above-referenced documents under seal.

Dated: April 15, 2024.

Respectfully submitted,

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*Submitted on behalf of all Plaintiff States*

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**CERTIFICATION OF CONFERENCE**

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ Geraldine Young  
Geraldine Young

**CERTIFICATE OF SERVICE**

I certify that on April 15, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Geraldine Young  
Geraldine Young